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October 31, 2024

## VIA ECF

Hon. Denise L. Cote, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street, Room 1910 New York, NY 10007 Re: Ramales Photography LLC v. Grailed, LLC, Case No. 1:24-cv-06244-DLC

## Dear Judge Cote:

We represent plaintiff Ramales Photography LLC ("Plaintiff") in the above captioned action. Pursuant to Paragraphs 1(A) and 1(E) of Your Honor's Individual Practices in Civil Cases, Plaintiff respectfully requests an adjournment of the November 22, 2024, Initial Pretrial Conference.

In support of this Motion, Plaintiff includes the following:

- (1) The Court has scheduled an Initial Pretrial Conference for November 22, 2024, at 2:00 p.m. (*Dkt. No. 12*);
- (2) This is Plaintiff's first request for an adjournment;
- (3) Good cause exists for the instant request as the undersigned counsel has been advised that counsel for defendant Grailed, LLC ("Defendant") will not be able to attend the November 22, 2024, conference in light of a previously scheduled medical procedure;
- (4) The parties have conferred, and counsel are mutually available the following dates for the conference at the Court's convenience:
  - a. November 25, 2024,
  - b. November 26, 2024,
  - c. December 6, 2024;
- (5) Defendant consents to this request.



The instant request is made in good faith and granting the requested adjournment will not prejudice any party to this matter. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Joshua D. Vera Joshua D. Vera Counsel for Plaintiff